

1 WRIGHT, FINLAY & ZAK, LLP
2 Ramir M. Hernandez, Esq.
3 Nevada Bar No. 13146
4 7785 W. Sahara Ave., Suite 200
5 Las Vegas, NV 89117
6 (702) 475-7964; Fax: (702) 946-1345
7 rhernandez@wrightlegal.net

8 *Attorneys for Defendants, DIRECTV, LLC and AT&T Services, Inc.*

9
10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 TIMOTHY TEXEIRA,

14 Plaintiff,

15 vs.

16 NATIONAL CONSUMER TELECOM &
17 UTILITIES EXCHANGE, INC.; LAC DU
18 FLAMBEAU BAND OF LAKE SUPERIOR
19 CHIPPEWA INDIANS DBA NIIZHWAASWI,
20 LLC DBA LOAN AT LAST, CNU ONLINE
21 HOLDINGS, LLC, ONE MAIN FINANCIAL,
22 DIRECTV, LLC, AT& T CORP DBA AT&T
23 UVERSE, CLARITY SERVICES LLC,
24 BACKGROUNDCHECKS.COM, LLC,

25 Defendants.

Case No.: 2:22-cv-00153-GMN-DJA

26 **JOINT MOTION TO EXTEND**
27 **DEADLINE TO RESPOND TO**
28 **PLAINTIFF’S COMPLAINT (THIRD**
REQUEST)

Plaintiff, Timothy Texeira (“Plaintiff”), and Defendants, DIRECTV, LLC and AT&T Services, Inc. (erroneously sued as “AT&T Corp. dba AT&T uVerse”) (“Defendants”) (collectively “the Parties”) by and through their counsel of record, hereby stipulated and agree as follows:

On January 27, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendants were served with Plaintiff’s Complaint on January 31, 2022. One February 10, 2022, the Parties filed a Joint Motion to Extend the Deadline to Respond to Plaintiff’s Complaint (“First Motion”) [ECF No. 12], and the Court entered an Order granting the First Motion [ECF No. 13]. On March 21, 2022, the Parties filed a second Joint motion to Extend the Time to Respond to Plaintiff’s Complaint (“Second Motion”) [ECF No. 28], and the Court entered an Order granting the Second Motion

[ECF No. 32]. The deadline for Defendants to respond to Plaintiff's Complaint is April 11, 2022. The Parties have discussed settlement for the past week and are closing in on a resolution and would like to avoid the time, resource, and expense of having Defendants file a responsive pleading.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants to file their responsive pleading to Plaintiff's Complaint to April 18, 2022.

This is the third motion for an extension of time for Defendants to file their responsive pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party. Barring an unforeseen emergency, Defendants will file an answer or otherwise responsive pleading by no later than April 18, 2022. In the meantime, the parties will continue their efforts to resolve this matter.

As part of this motion, Defendants agree to participate in any Rule 26(f) conference that occurs during the pendency of this extension.

DATED this 11th day of April, 2022.

WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

/s/ Ramir M. Hernandez

/s/ Gerardo Avalos

Ramir M. Hernandez, Esq.

Gerardo Avalos, Esq.

Nevada Bar No. 13146

Nevada Bar No. 15171

7785 W. Sahara Ave., Suite 200

8985 S. Eastern Ave. Suite 350

Las Vegas, NV 89117

Las Vegas, NV 89123

*Attorneys for Defendants, DIRECTV, LLC
and AT&T Services, Inc.*

Attorneys for Plaintiff, Timothy Texeira

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 12, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (THIRD REQUEST)** on the 11th day of April, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP